

EXHIBIT A



VERIZON SECURITY SUBPOENA COMPLIANCE

180 WASHINGTON VALLEY ROAD

BEDMINSTER NJ 07921

Phone: 888-483-2600 Fax: 325-949-6916

October 30, 2024

CHARLES C ADAMS
313 VOLLRATH
SHEBOYGAN WI 53081

Verizon Case #: 24567394
Docket / File #: 23-CV-1048
Target: [REDACTED]-1249,920-889-1255 |

Dear Customer,

This is to notify you that Verizon has received a subpoena requiring the production of certain records associated with the target referenced above.

Verizon has no information as to the purpose of the subpoena or the nature of the action. Any questions you have should be directed to the party who issued the subpoena.

Please be advised that unless Verizon is provided with a motion for a protective order or a motion to quash within 10 days from the date of this letter, Verizon intends to produce the records. Motion papers can be sent to Verizon via fax number 325-949-6916.

ANABEL H
VERIZON SECURITY SUBPOENA COMPLIANCE

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

Chad Pelishek

Plaintiff

v.

City of Sheboygan, Ryan Sorenson, Charles Adams,
Emily Rendall-Araujo, et al.

Defendant

Civil Action No. 23-cv-1048

VSATNJ
OCT 11 2024
CB

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Celco Partnership, Verizon Wireless, Subpoena Compliance Department, Custodian of Records

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: call, text, and billing records for phone numbers 920-889-1255 and other numbers associated with the account for Charles Adams or Chuck Adams as set forth more fully in Attachment 2 to this subpoena and notice.

Place: 361 Falls Road, Suite #610, Grafton, Wisconsin 53024

Date and Time:

11/01/2024 12:00 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/23/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Plaintiff Chad Pelishek, who issues or requests this subpoena, are:

Jennifer DeMaster, DeMaster Law LLC, 361 Falls Rd, Ste #610, Grafton, WI 53024

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

CHAD PELISHEK,

Plaintiff

v.

Case No. 23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

**NOTICE OF SERVICE OF SUBPOENA COMMANDING PRODUCTION
OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION OR
TANGIBLE THINGS (*DUCES TECUM*)**

TO: Cellco Partnership
d/b/a/ Verizon Wireless
Custodian of Records
180 Washington Valley Rd.
Bedminster, NJ 07921

PLEASE TAKE NOTICE that pursuant to Rules 45(a)(C), 45(a)(D), 45(a)(2), 45(C)(2), 45(d)(2) and 45(e)(1) of the Federal Rules of Civil Procedure ("FRCP"), the attached subpoena, issued from the United States District Court, Eastern District of Wisconsin, will be served by the undersigned counsel for Plaintiff Chad Pelishek in the above-entitled action, commanding the production of documents, electronically stored information, or tangible things (*duces tecum*) upon the Custodian of Records, Verizon Subpoena Compliance, Cellco Partnership, Verizon Wireless ("Verizon").

YOU ARE HEREBY ORDERED to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 on October 5, 2024, or at such other time and place agreed upon, all of the documents, electronically stored information, or tangible things in your

possession, custody, or control that are listed and described in Attachment II to this letter and subpoena *duces tecum*. *In lieu of appearing to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 1 on October 5, 2024, or at such other time and place agreed upon, **you may transmit the requested documents, electronically stored information, or tangible things** in your possession, custody, or control that are listed and described in Attachment II via the following options: (i) via mail, to the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024, or (ii) via electronic mail, to jennifer@demasterlaw.com. Such production will be for the purpose of inspection and copying, as desired. **This subpoena *duces tecum* does not request production of any information related to location-based services, GPS data, cell site data, short message service (“SMS” or “text messages”) content, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

Dated: September 24, 2024.

/s/ Jennifer T. DeMaster
Jennifer T. DeMaster
Wis. Bar No. 1124201
DeMaster Law LLC
361 Falls Rd., Ste # 610
Grafton, WI 53024
Ph: (414) 235-7488
Fax: (262) 536-0515
jennifer@demasterlaw.com
attorney@jenniferdemaster.com

Attorney for Plaintiff

ATTACHMENT I

INSTRUCTIONS & DEFINITIONS

1. Plaintiff Chad Pelishek hereby requests that, for the purposes of complying with the subpoena commanding production of documents, electronically stored information or tangible things (*duces tecum*), the Custodian of Records, Cellco Partnership/Verizon Wireless Subpoena Compliance, (“Verizon”) utilize the definitions proffered below.

2. The definitions proffered herein do not purport to expand the obligations to produce documents, electronically stored information or tangible things other than customer calling records or subscriber information as kept in the usual course of business.

3. **This subpoena *duces tecum* does not request production of any information related to location based services, GPS data, cell site data, short message service (“SMS” or “text messages”) content, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

4. In responding to the subpoena *duces tecum* served on you requesting the production of documents, electronically stored information, or tangible things, please furnish all documents, electronically stored information, or tangible things, however obtained, that are available to or in possession or control of yourself, your agents, and/or your attorneys.

5. Please produce documents, electronically stored information, or tangible things in a reasonably useable form.

6. Identify any documents, electronically stored information, or tangible things

responsive to this request that have been destroyed or are unavailable and state the circumstances of their destruction or unavailability

7. If you cannot respond to this request in full after exercising due diligence to secure the documents, electronically stored information, or tangible things, so state and respond to the extent possible, specifying your inability to provide the remaining documents, electronically stored information, or tangible things, stating whatever information or knowledge you have concerning the remaining documents, electronically stored information, or tangible things, and detailing what you did in attempting to secure the documents, electronically stored information, or tangible things.

8. This request shall be deemed to be continuing until and during the course of trial. Information sought by these requests and that you obtain after you respond to these requests must be disclosed to Plaintiff Chad Pelishek through his undersigned counsel herein by supplementary responses.

9. The itemized production requests below may be duplicative based on naming conventions for the relevant documents, electronically stored information, or tangible things sought which may be referred to by different names, sections, titles, etc., at various points of time from various telecommunications and/or wireless service providers.

DEFINITIONS

1. “You” or “your” includes, but is not limited to, Verizon Wireless, Cellco Partnership, and any other entities, subsidiaries or capacities which you possess an interest in.

2. “Person(s)” includes not only natural persons, but also firms, limited liability companies, professional limited liability companies, partnerships, associations, corporations,

subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trusts, groups, and organizations.

3. As used herein, any reference to any “person” includes the present and former officers, members, executives, partners, directors, trustees, employees, attorneys, agents, representatives, and all other persons acting or purporting to act on behalf of the person and also its subsidiaries, affiliates, divisions, and predecessors and successors in interest.

4. The singular of each word shall be construed to include its plural and vice versa, and the root word and all derivations (i.e., “ing,” “ed,” etc.) shall be construed to include each other.

5. The following rules of construction apply to these discovery requests:

- i. **All/Any/Each.** The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.
- ii. **And/Or.** The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- iii. **Number.** The use of the singular form of any word includes the plural and vice versa.
- iv. **Gender.** The masculine shall be construed to include the feminine and vice versa.
- v. **Tense.** The present tense shall be construed to include the past tense and vice versa.

6. “Knowledge,” “information,” “possession,” “custody,” and “control” of a person shall be construed to include such person’s agents, representatives, and attorneys.

7. “Including” shall have its ordinary meaning and shall mean “including but not limited to” and shall not indicate limitation to the examples or items mentioned.

8. “Reflect, refer, or relate to” means reflecting, referring to, relating to, regarding, describing, evidencing, discussing, concerning, mentioning, pertaining to,

alluding to, or associated with or constituting, directly or indirectly.

9. "To present" means to the date on which you respond to these interrogatories and requests.

10. "Document(s)" include all "writings," "recordings," and "photographs," as those terms are defined in Rule 1001 of the Federal Rules of Evidence ("FRE"), and should be construed in the broadest sense permissible. Accordingly, "document(s)" includes, but is not limited to, all written, printed, recorded or graphic matter, photographic matter, sound reproductions, or other retrievable data (whether recorded, taped, or coded electrostatically, electromagnetically, optically or otherwise on hard drive, diskette, compact disk, primary or backup tape, audio tape or video tape) from whatever source derived and however and by whomever prepared, produced, reproduced, disseminated or made. Without limiting the generality of the foregoing, "document(s)" includes the original and any non-identical copy and also every draft and proposed draft of all correspondence, internal memoranda, notes of meetings, telegrams, telexes, facsimiles, electronic mail, reports, transcripts or notes of telephone conversations, diaries, notebooks, minutes, notes, tests, reports, analyses, studies, testimony, speeches, worksheets, maps, charts, diagrams, computer printouts, and any other writings or documentary materials of any nature whatsoever, whether or not divulged to other parties, together with any attachments thereto and enclosures therewith. In addition, the word "document(s)" encompasses all forms and manifestations of electronically or optically coded, stored, and/or retrievable information, including but not limited to "email," "voice mail," digital images and graphics, digital or analog audiotapes and files, and digital or analog videotapes and files.

11. "Communication" means the transmittal of information (in the form of facts,

digits, numbers, alphanumeric representations, ideas, inquiries or otherwise).

12. Identify (with respect to persons). When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, telephone number (including, where applicable, country code) and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

13. Identify (with respect to documents). When referring to documents, “to identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; (iv) author(s), addressee(s) and recipient(s); (v) the location of the document; (vi) the identity of the person who has custody of the document; (vii) Whether the document has been destroyed, and if so, the date of its destruction, the reason for its destruction and the identity of the person who destroyed it or caused it to be destroyed.

Dated: September 25, 2024

DEMASTER LAW LLC

/s/ Jennifer DeMaster

Jennifer DeMaster

361 Falls Rd.,

Suite 610

Grafton, WI 53024

Tel: (414) 235-7488

Fax: (262) 234-7800

Direct: (920) 207-2071

Email: jennifer@demasterlaw.com

Email: paralegal@demasterlaw.com

Attorneys for Plaintiff Chad Pelishek

or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

3. Call history containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

4. Detailed billing history containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

5. Detailed monthly statement information containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

6. Service Call Details containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

7. Detailed account of whether any calls or texts have been deleted providing all details of any and all calls and texts that have been deleted within the following time frame: Any deletions of calls and/or texts that occurred between November 7, 2022 – present day for the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081.

8. Account information indicating whether the person referenced in this subpoena or any person on his behalf has cancelled his phone service, any phone line, cellular service, or changed, or deleted or canceled any telephone number(s) associated with the account of Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081 within the following time frame: February 6, 2023 – present day.

Dated: September 27, 2024.

/s/ Jennifer DeMaster
Jennifer DeMaster
State Bar No. 1124201
DeMaster Law LLC
361 Falls Rd #610
Grafton, WI 53024

Ph: (414) 235-7488
Fax: (262) 536-0515
jennifer@demasterlaw.com
attorney@jenniferdemaster.com

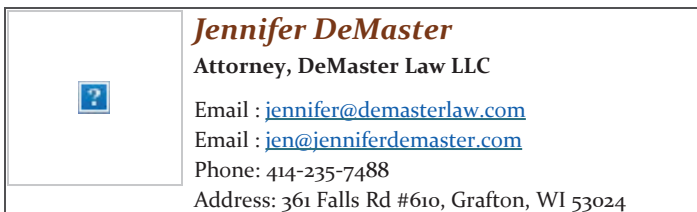
EXHIBIT C

From: [Jen DeMaster](#)
To: [Kerrie Murphy](#); [Warren Buliox](#)
Cc: [Brooke Klingbeil](#); [Paralegal](#)
Subject: Pelishek_NOS
Date: Monday, September 23, 2024 8:25:05 AM
Attachments: [image001.png](#)
[9.23.24 NOS_clean.pdf](#)

Caution: This email originated from outside your organization. Please be careful when opening attachments and embedded links.

Counsel, please see the attached Notice of forthcoming Subpoenas. Given our concerns and now confirmation about your clients redacting or deleting relevant call and text logs in phone records and refusal to produce full communications, it is now relevant and proportional to this case that we obtain all phone records from numbers affiliated with your clients from the relevant time period for this matter.

We plan to serve these subpoenas on or around September 25, 2024, but no later than September 27. We will agree to maintain these, for the time being, as Confidential or Attorney Eyes Only once we obtain them to assess all relevant data and will provide you with any copies.



Disclaimer: This message, including attachments, is confidential and may contain information protected by the attorney-client privilege or work product doctrine. If you are not the addressee, any disclosure, copying, distribution, or use of the contents of this message are prohibited. If you have received this email in error, please destroy it and notify me immediately.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

CHAD PELISHEK,

Plaintiff,

v.

Case No. 2:23-cv-1048-WED

CITY OF SHEBOYGAN, et. al.,

Defendants.

NOTICE OF SUBPOENAS FOR TELEPHONE RECORDS

PLEASE TAKE NOTICE that Plaintiff Chad Pelishek plans to service the attached subpoenas *duces tecum* on the following telephone companies for records of communications associated with the Defendants in the above-captioned matter. These shall not be served on the phone companies herein until September 25, 2024. Take further Notice that Plaintiff is willing to consider any narrowing of these subpoenas to produce records prior to service of these subpoenas upon any agreement by the parties.

Dated: September 23, 2024

Attorney for Plaintiff Chad Pelishek

/s/ Jennifer DeMaster

Jennifer DeMaster

Wis. Bar No. 1124201

attorney@jenniferdemaster.com

DEMASTER LAW LLC

361 Falls Rd # 610

Grafton, WI 53024

Phone: (414) 235-7488

Fax: (262) 536-0515

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

Chad Pelishek

Plaintiff

v.

City of Sheboygan, Ryan Sorenson, Charles Adams,
Emily Rendall-Araujo, et al.

Defendant

Civil Action No. 23-cv-1048

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Cellco Partnership, Verizon Wireless, Subpoena Compliance Department, Custodian of Records

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: call, text, and billing records for phone numbers 920-889-1255 and [REDACTED]-1249 associated with Charles Adams or Chuck Adams as set forth more fully in Attachment 2 to this subpoena and notice.

Place: 361 Falls Road, Suite #610, Grafton, Wisconsin 53024

Date and Time:

10/08/2024 12:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/23/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Jennifer T. DeMaster

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Plaintiff Chad Pelishek, who issues or requests this subpoena, are:

Jennifer DeMaster, DeMaster Law LLC, 361 Falls Rd, Ste #610, Grafton, WI 53024

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 23-cv-1048

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

DeMaster Law LLC

361 Falls Rd., Ste 610
Grafton, WI 53024
Telephone: (414) 235-7488
Facsimile: (262) 536-0515
Email: jennifer@demasterlaw.com

September 24, 2024

Cellco Partnership
d/b/a/ Verizon Wireless
Custodian of Records
180 Washington Valley Rd.
Bedminster, NJ 07921

Re: Records Request/Subpoena *duces tecum*
United States District Court
Eastern District of Wisconsin
Pelishek v. City of Sheboygan et. al., Case
No. 23-CV-1048

Dear Custodian of Records:

This firm represents the plaintiff Chad Pelishek in the above-entitled action. Attached please find the subpoena *duces tecum* ("subpoena") issued by the United States District Court, Eastern District of Wisconsin, requesting information contained therein and in Attachment II to said subpoena.

I have been informed by the Subpoena Compliance Department, Custodian of Records, Cellco Partnership, d/b/a Verizon Wireless ("Verizon") that service of subpoenas, pursuant to the internal policies and procedures of Verizon, that delivery/transmission of a subpoena may be tendered via facsimile. It is also my understanding that payment for the production of any records is requested by Verizon after the provision of any documents. If any of the instructions I have recited may be inaccurate or imprecise, kindly inform me and I will remediate these issues forthwith.

The attached subpoena is in compliance with Rule 45 of the Federal Rules of Civil Procedure ("FRCP"). To wit, this subpoena is issued from the United States District Court, Eastern District of Wisconsin, which is the Court where this action is pending. Rule 45(a)(2). Additionally, the subpoena is issued and signed by your undersigned, Jennifer DeMaster, an attorney duly authorized to practice in the Eastern District of Wisconsin. Rule 45(a)(3).

If there is any option whereby Verizon Subpoena Compliance Custodian of Records can expedite this request, I respectfully request that this be carried out, and affirmatively consent to payment of any expedited processing fees assessed by Verizon in accordance with said request.

If no options exist for expedited requests for the matter herein, please process this request accordingly.

Once the requested documents, electronically stored information, or tangible things (“records”) are assembled, you may, in lieu of appearance at the prescribed place set forth for production, transmit them to me via mail to DeMaster Law LLC, 361 Falls Rd., Ste #610, Grafton, Wisconsin 53024, or via email at jennifer@demasterlaw.com or paralegal@demasterlaw.com. Should you have any questions or concerns, please do not hesitate to contact me at (414)235-7488 or (920) 207-2071. Thank you in advance for your courtesies and cooperation.

Very truly yours,

Jennifer DeMaster

Attachments

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

CHAD PELISHEK,

Plaintiff

v.

Case No. 23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

**NOTICE OF SERVICE OF SUBPOENA COMMANDING PRODUCTION
OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION OR
TANGIBLE THINGS (*DUCES TECUM*)**

TO: Cellco Partnership
d/b/a/ Verizon Wireless
Custodian of Records
180 Washington Valley Rd.
Bedminster, NJ 07921

PLEASE TAKE NOTICE that pursuant to Rules 45(a)(C), 45(a)(D), 45(a)(2), 45(C)(2), 45(d)(2) and 45(e)(1) of the Federal Rules of Civil Procedure (“FRCP”), the attached subpoena, issued from the United States District Court, Eastern District of Wisconsin, will be served by the undersigned counsel for Plaintiff Chad Pelishek in the above-entitled action, commanding the production of documents, electronically stored information, or tangible things (*duces tecum*) upon the Custodian of Records, Verizon Subpoena Compliance, Cellco Partnership, Verizon Wireless (“Verizon”).

YOU ARE HEREBY ORDERED to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 on October 7, 2024, or at such other time and place agreed upon, all of the documents, electronically stored information, or tangible things in your

possession, custody, or control that are listed and described in Attachment II to this letter and subpoena *duces tecum*. *In lieu of appearing to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 1 on October 7, 2024, or at such other time and place agreed upon, **you may transmit the requested documents, electronically stored information, or tangible things** in your possession, custody, or control that are listed and described in Attachment II via the following options: (i) via mail, to the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024, or (ii) via electronic mail, to jennifer@dematerlaw.com. Such production will be for the purpose of inspection and copying, as desired. **This subpoena *duces tecum* does not request production of any information related to location-based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

Dated: September 24, 2024.

/s/ Jennifer T. DeMaster
Jennifer T. DeMaster
Wis. Bar No. 1124201
DeMaster Law LLC
361 Falls Rd., Ste # 610
Grafton, WI 53024
Ph: (414) 235-7488
Fax: (262) 536-0515
jennifer@demasterlaw.com
attorney@jenniferdemaster.com

Attorney for Plaintiff

ATTACHMENT I

INSTRUCTIONS & DEFINITIONS

1. Plaintiff Chad Pelishek hereby requests that, for the purposes of complying with the subpoena commanding production of documents, electronically stored information or tangible things (*duces tecum*), the Custodian of Records, Cellco Partnership/Verizon Wireless Subpoena Compliance, (“Verizon”) utilize the definitions proffered below.

2. The definitions proffered herein do not purport to expand the obligations to produce documents, electronically stored information or tangible things other than customer calling records or subscriber information as kept in the usual course of business.

3. This subpoena *duces tecum* does not request production of any information related to location based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.

4. In responding to the subpoena *duces tecum* served on you requesting the production of documents, electronically stored information, or tangible things, please furnish all documents, electronically stored information, or tangible things, however obtained, that are available to or in possession or control of yourself, your agents, and/or your attorneys.

5. Please produce documents, electronically stored information, or tangible things in a reasonably useable form.

6. Identify any documents, electronically stored information, or tangible things

responsive to this request that have been destroyed or are unavailable and state the circumstances of their destruction or unavailability

7. If you cannot respond to this request in full after exercising due diligence to secure the documents, electronically stored information, or tangible things, so state and respond to the extent possible, specifying your inability to provide the remaining documents, electronically stored information, or tangible things, stating whatever information or knowledge you have concerning the remaining documents, electronically stored information, or tangible things, and detailing what you did in attempting to secure the documents, electronically stored information, or tangible things.

8. This request shall be deemed to be continuing until and during the course of trial. Information sought by these requests and that you obtain after you respond to these requests must be disclosed to Plaintiff Chad Pelishek through his undersigned counsel herein by supplementary responses.

9. The itemized production requests below may be duplicative based on naming conventions for the relevant documents, electronically stored information, or tangible things sought which may be referred to by different names, sections, titles, etc., at various points of time from various telecommunications and/or wireless service providers.

DEFINITIONS

1. “You” or “your” includes, but is not limited to, Verizon Wireless, Cellco Partnership, and any other entities, subsidiaries or capacities which you possess an interest in.

2. “Person(s)” includes not only natural persons, but also firms, limited liability companies, professional limited liability companies, partnerships, associations, corporations,

subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trusts, groups, and organizations.

3. As used herein, any reference to any “person” includes the present and former officers, members, executives, partners, directors, trustees, employees, attorneys, agents, representatives, and all other persons acting or purporting to act on behalf of the person and also its subsidiaries, affiliates, divisions, and predecessors and successors in interest.

4. The singular of each word shall be construed to include its plural and vice versa, and the root word and all derivations (i.e., “ing,” “ed,” etc.) shall be construed to include each other.

5. The following rules of construction apply to these discovery requests:

- i. **All/Any/Each.** The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.
- ii. **And/Or.** The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- iii. **Number.** The use of the singular form of any word includes the plural and vice versa.
- iv. **Gender.** The masculine shall be construed to include the feminine and vice versa.
- v. **Tense.** The present tense shall be construed to include the past tense and vice versa.

6. “Knowledge,” “information,” “possession,” “custody,” and “control” of a person shall be construed to include such person’s agents, representatives, and attorneys.

7. “Including” shall have its ordinary meaning and shall mean “including but not limited to” and shall not indicate limitation to the examples or items mentioned.

8. “Reflect, refer, or relate to” means reflecting, referring to, relating to, regarding, describing, evidencing, discussing, concerning, mentioning, pertaining to,

alluding to, or associated with or constituting, directly or indirectly.

9. “To present” means to the date on which you respond to these interrogatories and requests.

10. “Document(s)” include all “writings,” “recordings,” and “photographs,” as those terms are defined in Rule 1001 of the Federal Rules of Evidence (“FRE”), and should be construed in the broadest sense permissible. Accordingly, “document(s)” includes, but is not limited to, all written, printed, recorded or graphic matter, photographic matter, sound reproductions, or other retrievable data (whether recorded, taped, or coded electrostatically, electromagnetically, optically or otherwise on hard drive, diskette, compact disk, primary or backup tape, audio tape or video tape) from whatever source derived and however and by whomever prepared, produced, reproduced, disseminated or made. Without limiting the generality of the foregoing, “document(s)” includes the original and any non-identical copy and also every draft and proposed draft of all correspondence, internal memoranda, notes of meetings, telegrams, telexes, facsimiles, electronic mail, reports, transcripts or notes of telephone conversations, diaries, notebooks, minutes, notes, tests, reports, analyses, studies, testimony, speeches, worksheets, maps, charts, diagrams, computer printouts, and any other writings or documentary materials of any nature whatsoever, whether or not divulged to other parties, together with any attachments thereto and enclosures therewith. In addition, the word “document(s)” encompasses all forms and manifestations of electronically or optically coded, stored, and/or retrievable information, including but not limited to “email,” “voice mail,” digital images and graphics, digital or analog audiotapes and files, and digital or analog videotapes and files.

11. “Communication” means the transmittal of information (in the form of facts,

digits, numbers, alphanumeric representations, ideas, inquiries or otherwise).

12. Identify (with respect to persons). When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, telephone number (including, where applicable, country code) and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

13. Identify (with respect to documents). When referring to documents, “to identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; (iv) author(s), addressee(s) and recipient(s); (v) the location of the document; (vi) the identity of the person who has custody of the document; (vii) Whether the document has been destroyed, and if so, the date of its destruction, the reason for its destruction and the identity of the person who destroyed it or caused it to be destroyed.

ATTACHMENT II

INTRODUCTION

1. The definitions and instructions set forth in Attachment I are incorporated herein by reference.

2. **This subpoena *duces tecum* does not request production of any information related to location-based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

3. For a statement of your obligations in producing documents under this subpoena, see Rules 45(d)(1) and (2) of the Federal Rules of Civil Procedure (“FRCP”), which appear on the final page of the subpoena *duces tecum* form being provided herein.

PRODUCTION REQUESTS

1. Records, time and duration of incoming and outgoing calls and text messages placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024

2. Call logs containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned

or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

3. Call history containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

4. Detailed billing history containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

5. Detailed monthly statement information containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

6. Service Call Details containing records, time and duration of incoming and outgoing calls placed or received by the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081, for the following dates:

- October 10, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

7. Detailed account of whether any calls or texts have been deleted providing all details of any and all calls and texts that have been deleted within the following time frame: Any deletions of calls and/or texts that occurred between November 7, 2022 – present day for the telephone numbers 920-889-1255 and [REDACTED]-1249 owned or associated with Charles Adams or Chuck Adams, Date of Birth: October 1968, Possible Address: 313 Vollrath Blvd., Sheboygan, WI 53081.

8. Account information indicating whether the person referenced in this subpoena or any person on his behalf has cancelled his phone service, cellular service, or changed his telephone number(s) within the following time frame: February 6, 2023 – present day.

Dated: September 25, 2024

Sincerely,

DEMASTER LAW LLC

Electronically Signed by: /s/ Jennifer DeMaster

Jennifer DeMaster

361 Falls Rd.,

Suite 610

Grafton, WI 53024

Tel: (414) 235-7488

Fax: (262) 234-7800

Direct: (920) 207-2071

Email: jennifer@demasterlaw.com

Email: paralegal@demasterlaw.com

Attorneys for Plaintiff Chad Pelishek

DeMaster Law LLC

361 Falls Rd., Ste 610
Grafton, WI 53024
Telephone: (414) 235-7488
Facsimile: (262) 536-0515
Email: jennifer@demasterlaw.com

September 24, 2024

Custodian of Records
T-Mobile Subpoena Compliance
4 Sylvan Way
Parsippany, NJ 07054

Re: Records Request/Subpoena *duces tecum*
United States District Court
Eastern District of Wisconsin
Pelishek v. City of Sheboygan et. al., Case
No. 23-CV-1048

Dear Custodian of Records:

This firm represents the plaintiff Chad Pelishek in the above-entitled action. Attached please find the subpoena *duces tecum* ("subpoena") issued by the United States District Court, Eastern District of Wisconsin, requesting information contained therein and in Attachment II to said subpoena.

I have been informed by the Subpoena Compliance Department, T-Mobile USA, Inc. ("T-Mobile"), that service of subpoenas, pursuant to the internal policies and procedures of T-Mobile, that delivery/transmission of a subpoena may be tendered via facsimile. It is also my understanding that payment for the production of any records is requested by T-Mobile after the provision of any documents. If any of the instructions I have recited may be inaccurate or imprecise, kindly inform me and I will remediate these issues forthwith.

The attached subpoena is in compliance with Rule 45 of the Federal Rules of Civil Procedure ("FRCP"). To wit, this subpoena is issued from the United States District Court, Eastern District of Wisconsin, which is the Court where this action is pending. Rule 45(a)(2). Additionally, the subpoena is issued and signed by your undersigned, Jennifer DeMaster, an attorney duly authorized to practice in the Eastern District of Wisconsin. Rule 45(a)(3).

If there is any option whereby T-Mobile Subpoena Compliance can expedite this request, I respectfully request that this be carried out, and affirmatively consent to payment of any expedited processing fees assessed by T-Mobile in accordance with said request. If no options exist for expedited requests for the matter herein, please process this request accordingly.

Once the requested documents, electronically stored information, or tangible things (“records”) are assembled, you may, in lieu of appearance at the prescribed place set forth for production, transmit them to me via mail to DeMaster Law LLC, 361 Falls Rd., Ste #610, Grafton, Wisconsin 53024, or via email at jennifer@demasterlaw.com or paralegal@demasterlaw.com. Should you have any questions or concerns, please do not hesitate to contact me at (414)235-7488 or (920) 207-2071. Thank you in advance for your courtesies and cooperation.

Very truly yours,

Jennifer DeMaster

Attachments

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

CHAD PELISHEK,

Plaintiff

v.

Case No. 23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

**NOTICE OF SERVICE OF SUBPOENA COMMANDING PRODUCTION
OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION OR
TANGIBLE THINGS (*DUCES TECUM*)**

TO: Custodian of Records
T-Mobile Subpoena Compliance
4 Sylvan Way
Parsippany, NJ 07054

PLEASE TAKE NOTICE that pursuant to Rules 45(a)(C), 45(a)(D), 45(a)(2), 45(C)(2), 45(d)(2) and 45(e)(1) of the Federal Rules of Civil Procedure (“FRCP”), the attached subpoena, issued from the United States District Court, Eastern District of Wisconsin, will be served by the undersigned counsel for Plaintiff Chad Pelishek in the above-entitled action, commanding the production of documents, electronically stored information, or tangible things (*duces tecum*) upon the Custodian of Records, T-Mobile Subpoena Compliance, T-Mobile USA, Inc. (“T-Mobile”).

YOU ARE HEREBY ORDERED to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 on October 7, 2024, or at such other time and place agreed upon, all of the documents, electronically stored information, or tangible things in your

possession, custody, or control that are listed and described in Attachment II to this letter and subpoena *duces tecum*. *In lieu of appearing to produce at the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024 1 on October 7, 2024, or at such other time and place agreed upon, **you may transmit the requested documents, electronically stored information, or tangible things** in your possession, custody, or control that are listed and described in Attachment II via the following options: (i) via mail, to the offices of DeMaster Law LLC, 361 Falls Road, Suite #610, Grafton, WI 53024, or (ii) via electronic mail, to jennifer@demasterlaw.com. Such production will be for the purpose of inspection and copying, as desired. **This subpoena *duces tecum* does not request production of any information related to location-based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

Dated: September 24, 2024.

/s/ Jennifer T. DeMaster
Jennifer T. DeMaster
Wis. Bar No. 1124201
DeMaster Law LLC
361 Falls Rd., Ste # 610
Grafton, WI 53024
Ph: (414) 235-7488
Fax: (262) 536-0515
jennifer@demasterlaw.com
attorney@jenniferdemaster.com

Attorney for Plaintiff

ATTACHMENT I

INSTRUCTIONS & DEFINITIONS

1. Plaintiff Chad Pelishek hereby requests that, for the purposes of complying with the subpoena commanding production of documents, electronically stored information or tangible things (*duces tecum*), the Custodian of Records, T-Mobile Subpoena Compliance, T-Mobile USA, Inc. (“T-Mobile”) utilize the definitions proffered below.

2. The definitions proffered herein do not purport to expand the obligations to produce documents, electronically stored information or tangible things other than customer calling records or subscriber information as kept in the usual course of business.

3. This subpoena *duces tecum* does not request production of any information related to location based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.

4. In responding to the subpoena *duces tecum* served on you requesting the production of documents, electronically stored information, or tangible things, please furnish all documents, electronically stored information, or tangible things, however obtained, that are available to or in possession or control of yourself, your agents, and/or your attorneys.

5. Please produce documents, electronically stored information, or tangible things in a reasonably useable form.

6. Identify any documents, electronically stored information, or tangible things

responsive to this request that have been destroyed or are unavailable and state the circumstances of their destruction or unavailability

7. If you cannot respond to this request in full after exercising due diligence to secure the documents, electronically stored information, or tangible things, so state and respond to the extent possible, specifying your inability to provide the remaining documents, electronically stored information, or tangible things, stating whatever information or knowledge you have concerning the remaining documents, electronically stored information, or tangible things, and detailing what you did in attempting to secure the documents, electronically stored information, or tangible things.

8. This request shall be deemed to be continuing until and during the course of trial. Information sought by these requests and that you obtain after you respond to these requests must be disclosed to Plaintiff Chad Pelishek through his undersigned counsel herein by supplementary responses.

9. The itemized production requests below may be duplicative based on naming conventions for the relevant documents, electronically stored information, or tangible things sought which may be referred to by different names, sections, titles, etc., at various points of time from various telecommunications and/or wireless service providers.

DEFINITIONS

1. “You” or “your” includes, but is not limited to, T-Mobile USA, Inc., Omnipoint Communications, Inc. and any other entities, subsidiaries or capacities which you possess an interest in.

2. “Person(s)” includes not only natural persons, but also firms, limited liability companies, professional limited liability companies, partnerships, associations, corporations,

subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trusts, groups, and organizations.

3. As used herein, any reference to any “person” includes the present and former officers, members, executives, partners, directors, trustees, employees, attorneys, agents, representatives, and all other persons acting or purporting to act on behalf of the person and also its subsidiaries, affiliates, divisions, and predecessors and successors in interest.

4. The singular of each word shall be construed to include its plural and vice versa, and the root word and all derivations (i.e., “ing,” “ed,” etc.) shall be construed to include each other.

5. The following rules of construction apply to these discovery requests:

- i. **All/Any/Each.** The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.
- ii. **And/Or.** The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- iii. **Number.** The use of the singular form of any word includes the plural and vice versa.
- iv. **Gender.** The masculine shall be construed to include the feminine and vice versa.
- v. **Tense.** The present tense shall be construed to include the past tense and vice versa.

6. “Knowledge,” “information,” “possession,” “custody,” and “control” of a person shall be construed to include such person’s agents, representatives, and attorneys.

7. “Including” shall have its ordinary meaning and shall mean “including but not limited to” and shall not indicate limitation to the examples or items mentioned.

8. “Reflect, refer, or relate to” means reflecting, referring to, relating to, regarding, describing, evidencing, discussing, concerning, mentioning, pertaining to,

alluding to, or associated with or constituting, directly or indirectly.

9. “To present” means to the date on which you respond to these interrogatories and requests.

10. “Document(s)” include all “writings,” “recordings,” and “photographs,” as those terms are defined in Rule 1001 of the Federal Rules of Evidence (“FRE”), and should be construed in the broadest sense permissible. Accordingly, “document(s)” includes, but is not limited to, all written, printed, recorded or graphic matter, photographic matter, sound reproductions, or other retrievable data (whether recorded, taped, or coded electrostatically, electromagnetically, optically or otherwise on hard drive, diskette, compact disk, primary or backup tape, audio tape or video tape) from whatever source derived and however and by whomever prepared, produced, reproduced, disseminated or made. Without limiting the generality of the foregoing, “document(s)” includes the original and any non-identical copy and also every draft and proposed draft of all correspondence, internal memoranda, notes of meetings, telegrams, telexes, facsimiles, electronic mail, reports, transcripts or notes of telephone conversations, diaries, notebooks, minutes, notes, tests, reports, analyses, studies, testimony, speeches, worksheets, maps, charts, diagrams, computer printouts, and any other writings or documentary materials of any nature whatsoever, whether or not divulged to other parties, together with any attachments thereto and enclosures therewith. In addition, the word “document(s)” encompasses all forms and manifestations of electronically or optically coded, stored, and/or retrievable information, including but not limited to “email,” “voice mail,” digital images and graphics, digital or analog audiotapes and files, and digital or analog videotapes and files.

11. “Communication” means the transmittal of information (in the form of facts,

digits, numbers, alphanumeric representations, ideas, inquiries or otherwise).

12. Identify (with respect to persons). When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, telephone number (including, where applicable, country code) and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

13. Identify (with respect to documents). When referring to documents, “to identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; (iv) author(s), addressee(s) and recipient(s); (v) the location of the document; (vi) the identity of the person who has custody of the document; (vii) Whether the document has been destroyed, and if so, the date of its destruction, the reason for its destruction and the identity of the person who destroyed it or caused it to be destroyed.

ATTACHMENT II

INTRODUCTION

1. The definitions and instructions set forth in Attachment I are incorporated herein by reference.

2. **This subpoena *duces tecum* does not request production of any information related to location-based services, GPS data, cell site data, short message service (“SMS” or “text messages”) transmissions and content thereof, IP addresses, payment information and subscriber information, including Electronic Serial Numbers (“ESN”). None of the documents, electronically stored information, or tangible things requested herein is subject to any provisions of the Stored Communications Act (“SCA”), 18 U.S.C. § 2701 et seq.**

3. For a statement of your obligations in producing documents under this subpoena, see Rules 45(d)(1) and (2) of the Federal Rules of Civil Procedure (“FRCP”), which appear on the final page of the subpoena *duces tecum* form being provided herein.

PRODUCTION REQUESTS

1. Records, time and duration of incoming and outgoing calls and text messages placed or received by the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024

2. Call logs containing records, time and duration of incoming and outgoing calls and text messages placed or received by the telephone number 414-324-3771 owned or

associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

3. Call history containing records, time and duration of incoming and outgoing calls and texts placed or received by the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

4. Detailed billing history containing records, time and duration of incoming and outgoing calls and texts placed or received by the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

5. Detailed monthly statement information containing records, time and duration of incoming and outgoing calls and texts placed or received by the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan,

Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

6. Cellular Service Call Details containing records, time and duration of incoming and outgoing calls and text messages placed or received by the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081, for the following dates:

- August 1, 2022 – May 2, 2023; and
- July 15, 2024 – September 1, 2024.

7. Detailed account of whether any calls or texts have been deleted providing all details of any and all calls and texts that have been deleted within the following time frame: Any deletions of calls and/or texts that occurred between November 7, 2022 – present day for the telephone number 414-324-3771 owned or associated with Charles Adams or Chuck Adams or any variation thereof, Date of Birth: October 1968; Address: 313 Vollrath Blvd., Sheboygan, Wisconsin 53081.

8. Documentation indicating when this phone number or account was opened or commenced for the above-referenced individual or any association therein.

Dated: September 24, 2024

Sincerely,

DEMASTER LAW LLC

Electronically Signed by: /s/ Jennifer DeMaster

Jennifer DeMaster

361 Falls Rd.,

Suite 610

Grafton, WI 53024

Tel: (414) 235-7488

Fax: (262) 234-7800

Direct: (920) 207-2071

Email: jennifer@demasterlaw.com

Email: paralegal@demasterlaw.com

Attorneys for Plaintiff Chad Pelishek

EXHIBIT E

From: [Kerrie Murphy](#)
To: [Jen DeMaster](#)
Cc: [Warren Buliox](#); [Katie Dienberg](#); [Anthony Jackson](#); [Paralegal](#)
Subject: Pelishek litigation - Follow up to meet and confer conference call on Sept. 23, 2024
Date: Wednesday, September 25, 2024 5:13:35 PM
Attachments: [image001.png](#)
[Defendants response to DeMaster 9.17.24 GFL Ltr - corrected to remove reference to settlement communication and resent on 9.23.24.pdf](#)
[MG000927-Pel - MG000929-Pel.pdf](#)
[CA000001-Pel - CA000003-Pel Confidential Attorneys Eyes Only.pdf](#)
[CA000023-Pel - CA000237-Pel Confidential Attorneys Eyes Only.pdf](#)
[RS000476\(Wolf\) - RS000519\(Wolf\) CONFIDENTIAL ATTORNEYS EYES ONLY.pdf](#)
[ERA000001-Pel - ERA000181-Pel CONFIDENTIAL ATTORNEYS EYES ONLY.pdf](#)

Jen,

As you requested, here is another copy of the letter we sent to you on September 20, 2024, which as removed the incorrect designation that it was a confidential settlement communication.

I misspoke during our meet and confer call on Sept. 23 in relation to the screenshot of the 3/7/2023 email that you provided to us. I was referring to the email that we produced with our September 20th letter which was Bates stamped MG000921-MG000926 when I made that statement during our call. I apologize for misspeaking. The 3/7/2023 email was not one of the emails that IT Director Greenwood pulled in relation to the ESI searches that he conducted regarding the Requests for Production served on Mayor Sorenson. However, since we did agree to produce the email that was depicted in the screenshot provided by Plaintiff, during our meet and confer call today, I had IT Director Greenwood search for the email and send it to me. It is attached to this email as MG000927-MG000929.

As we indicated during our call on Sept. 23, Plaintiff's email address was not included in the search that was done in relation to Mayor Sorenson's Request No. 3 and Ms. Rendall-Araujo – Request No. 8. All other known email addresses for any individual listed in both parties initial disclosures were included in the ESI searches run by IT Director Greenwood. We assumed that you would specifically list Plaintiff if you wanted his email account included in a search. However, given your assertion that Plaintiff is listed in the Initial Disclosures" and should have been included these searches, we have asked IT Director Greenwood to run a search for these 2 Requests. If there are any emails "relating to the allegations in the above-captioned case, the above-captioned case, Chad, Pelishek, or any legal counsel for Chad Pelishek" pulled by these searches, these 2 responses will be supplemented.

City Attorney Adams. We have attached unredacted copies of CA000001-CA000003. **Please substitute this production for the prior redacted copies.**

We disagree that Request No. 1 issued to City Attorney Adams asked for billing statements for his cell phone number. His cell phone number was not included as one of the phone numbers specifically listed in the Request and it is a phone number that Plaintiff's counsel knew was

associated with this defendant since redacted cell phone records were produced in the Wolf litigation. However, to resolve this dispute, City Attorney Adams has agreed to produce copies of his cell phone records from August 22, 2022 – May 1, 2023, Bates stamped CA000023-Pel – CA000237-Pel. There are 5 cell phone numbers associated with Account, (920) 889-1255 is the cell phone number assigned to City Attorney Adams. The other lines are used by his family members and information related to those lines has been redacted.

All phone records produced by City Attorney Adams are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

Mayor Sorenson. We have attached unredacted copies of RS000476-RS000519(Wolf) which were Mayor Sorenson’s redacted cell phone records produced in the Wolf litigation as you requested during our call.

Mayor Sorenson cannot access his call/text log records any further back than what has been provided via his online account. He sent a request to AT & T for billing statements from August 22, 2022 – May 1, 2023 as well as his call and text logs for August 22, 2022 – October 31, 2022 and February 3, 2023 – May 1, 2023. We will produce what we are provided once we have received them from A T & T.

All phone records produced by Mayor Sorenson are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

Emily Rendall-Araujo. We have attached unredacted copies of ERA000001-Pel – ERA000181-Pel, which covers the time period identified in Request No. 1. **Please substitute this production for the prior redacted copies.** There are 4 lines associated with this Account, (920) 207-5899 is the cell phone number assigned to Emily. The other lines are used by her family members and information related to those lines has been redacted.

All phone records produced by Emily are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

City Phone records. IT Director Greenwood has advised that he has requested copies of the phone records responsive to subpoena Topic 11. We will supplement the City’s response to the subpoena once we receive these records.

We anticipate that the information provided in our letter dated September 20, 2024, our meet and confer call on September 23, 2024, as well as this additional production has addressed the discovery issues raised by you in your September 17 letter. Please confirm that you will not be sending any subpoenas for phone records based on our compromises and production of unredacted phone records.

Kerrie M. Murphy
Managing Partner
D: 515.657.5684



West Des Moines Office:

Regency West Office Park | Building 8
4350 Westown Parkway, Suite 120
West Des Moines, IA 50266
T: 515.453.8509 | **F:** 515.267.1408

Milwaukee Office

735 North Water Street | Suite 610 | Milwaukee | WI 53202
T: 414.436.0353 | **F:** 414.436.0354



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Aug 22, 2022 - Sep 21, 2022 | Account # [REDACTED]

Account Number redacted | Invoice # 4404258309

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

[REDACTED]

CHARLES C ADAMS

Street Address redacted

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your September bill is

It's due on Oct 13, 2022.

Account charges

\$54.50

Other family member cell phone numbers redacted

Charles C Adams
920-889-1255

\$31.27

Other family member cell phone numbers redacted

\$186.89

Balance forward from last bill

Total balance forward

\$0.00

Good to know

Check your online bill for all surcharges, taxes and gov fees

Account Charges

Unused Carryover data from last month expired September 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Sep 22 - Oct 21)
 4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Sep 22 - Oct 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Aug 22 - Sep 21)

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

Monthly charges and credits

Smartphone Line Access (Sep 22 - Oct 21)

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Add-ons

Verizon Cloud 600 GB - (Sep 22 - Oct 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

This month's data usage

0.59 GB


Other family member cell phone numbers redacted





CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams


920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted


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Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

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Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted





Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services. **Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.**

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are \$186.89.

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were \$150.00 (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: \$9.60 for voice, \$1.95 for messaging, \$138.45 for data, and \$0.00 for other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Additional information

Consider it fixed

It's the last warranty you'll need for your connected home products. Get repairs or replacements for covered breakdowns of eligible home entertainment, home office, wearables and smart home products - with Verizon Home Device Protect. Visit verizon.com/homedeviceprotect

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Billing period Aug 22, 2022 - Sep 21, 2022 | Account # [REDACTED]

Invoice # 4404258309

CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

September 21, 2022

[REDACTED]

4404258309

Total Amount Due by October 13, 2022

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$ [REDACTED]

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

IMPORTANT INFORMATION:

Many questions regarding billing can be resolved easily online or in the My Verizon App. Our customer service representatives are also available by phone, chat or in a retail store to assist you with billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to the below address.

Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

		<hr/>	
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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Sep 22, 2022 - Oct 21, 2022 | Account # [redacted] | Invoice # 4417062759

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

|||||

CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your October bill is [redacted]

It's due on Nov 13, 2022.

Account charges [redacted]

Other family member cell phone numbers redacted

Charles C Adams
920-889-1255 [redacted]

Other family member cell phone numbers redacted

Good to know

Check your online bill for all surcharges, taxes and gov fees

Balance forward from last bill

Previous balance (through Sep 21)

Payment received - Thank you (Oct 13)

Total balance forward [redacted]



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Changes this month

Sep

Oct

Change

Account Charges

[REDACTED]

Other family member cell phone numbers redacted

[REDACTED]

CHARLES C ADAMS
920.889.1255

[REDACTED]

Other family member cell phone numbers redacted

[REDACTED]

Change total

[REDACTED]

Understand your bill

Understand "Changes this month"

These changes are why your amount due is different than last month. For example, if you changed your plan or added a line, you'll see partial-month charges reflected in this table. The table will not display if you have no changes.

Account Charges

Unused Carryover data from last month expired October 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

One-time charges and credits

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Oct 22 - Nov 21)
 4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Oct 22 - Nov 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Sep 22 - Oct 21)

Over age

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

Monthly charges and credits

Smartphone Line Access (Oct 22 - Nov 21)

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Add-ons

Verizon Cloud 600 GB - (Oct 22 - Nov 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

This month's data usage

Other family member cell phone numbers redacted






CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted

Talk activity

Call logs for other family member cell phone numbers redacted

Call logs for other family member cell phone numbers redacted


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Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

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Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255
GOOGLE PIXEL4A G025J NVZW

Talk activity



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity (cont.)

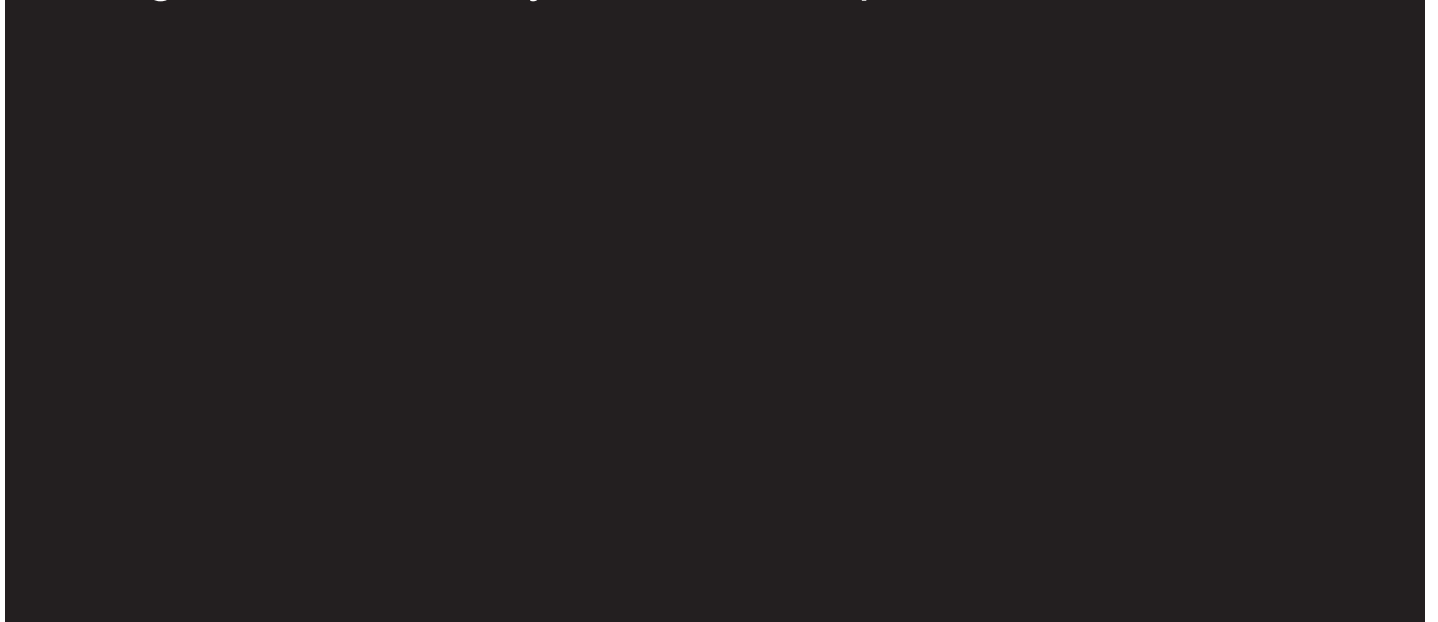


Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



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Call logs for other family member cell phone numbers redacted

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

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Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

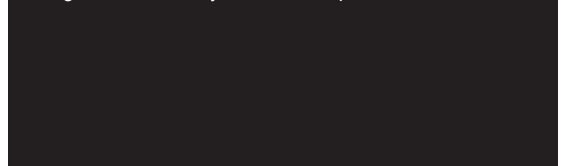


Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services. **Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.**

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

FUSC Change

The Federal Universal Service Charge (FUSC) is a Verizon Wireless charge that is subject to change each calendar quarter based on contribution rates prescribed by the FCC. On October 1, the FUSC decreased to 8.86% of assessable wireless charges, other than separately billed interstate and international telecom charges. The FUSC on separately billed interstate and international telecom charges decreased to 28.9%. For more details, please call 1-888-684-1888.

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are \$201.49.

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were \$150.00 (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: \$9.60 for voice, \$1.95 for messaging, \$138.45 for data, and \$0.00 for other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.



CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

October 21, 2022

[redacted]

4417062759

Total Amount Due by November 13, 2022

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

IMPORTANT INFORMATION:

Many questions regarding billing can be resolved easily online or in the My Verizon App. Our customer service representatives are also available by phone, chat or in a retail store to assist you with billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to the below address.

Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Oct 22, 2022 - Nov 21, 2022 | Account # [REDACTED]

Invoice # 4429853429

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

[REDACTED]

CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your November bill is [REDACTED]

It's due on Dec 13, 2022.

Account charges [REDACTED]

Other family member cell phone numbers redacted

Charles C Adams
920-889-1255

Other family member cell phone numbers redacted

Good to know

Check your online bill for all surcharges, taxes and gov fees

Balance forward from last bill

Previous balance (through Oct 21)

Payment received - Thank you (Nov 13)

Total balance forward



Changes this month	Oct	Nov	Change
Account Charges	[REDACTED]		
Change total			[REDACTED]

Understand your bill

Understand "Changes this month"

These changes are why your amount due is different than last month. For example, if you changed your plan or added a line, you'll see partial-month charges reflected in this table. The table will not display if you have no changes.

Account Charges

Unused Carryover data from last month expired November 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Nov 22 - Dec 21)
4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Nov 22 - Dec 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Oct 22 - Nov 21)

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

Monthly charges and credits

Smartphone Line Access (Nov 22 - Dec 21)

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Add-ons

Verizon Cloud 600 GB - (Nov 22 - Dec 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted





CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the majority of the page content.

Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity



Charles C Adams


920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity (cont.)



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Important Information Regarding Your Customer Agreement

Verizon has updated parts of your Customer Agreement. In the "My Privacy" section, we specified where California residents can view our California privacy notice. In the "Can I have someone else manage my Postpay account" section, we clarified age restrictions for Account Managers. In the "Can Verizon change this Agreement or my Service" section, we clarified which changes Verizon will provide advance notice of, and that you may choose to have dispute resolution provisions that were updated after a dispute arose apply to that pending dispute. In the "What Charges are set by Verizon?" and "Government Taxes, Fees and Other Charges" sections we clarified the fees, surcharges, and charges that are set by Verizon or federal, state and local governments and when we can provide notice, if any, of changes to them. In the "What if my wireless device gets lost or stolen?" section, we described policies applicable to the activation of devices that are reported lost or stolen. In the "What are Verizon's rights to limit or end Service or end this Agreement?" section, we clarified policies regarding statistically abnormal data use on smartphones. In the "WAIVERS AND LIMITATIONS OF LIABILITY" section, we clarified our mutual limitations on claiming damages in a dispute. In the "HOW DO I RESOLVE DISPUTES WITH VERIZON?" section, we clarified the policies and procedures regarding arbitration. In the "About this Agreement" section, we clarified the rules governing the severability and scope of the Agreement.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Additional information

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows:

[REDACTED]
and \$0.00 for other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.



CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

November 21, 2022
[redacted]
4429853429

Total Amount Due by December 13, 2022

Make check payable to Verizon Wireless.
Please return this remittance slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



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- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

	<div style="border: 1px solid red; width: 100px; height: 20px; display: inline-block;"></div>	<div style="border-bottom: 1px solid red; height: 20px; width: 100%;"></div>	
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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Nov 22, 2022 - Dec 21, 2022 | Account # [REDACTED] | Invoice # 4442688457

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

|||||

CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your December bill is [REDACTED]

It's due on Jan 13, 2023.

Account charges [REDACTED]

Other family member cell phone numbers redacted

Charles C Adams
920-889-1255

Other family member cell phone numbers redacted

Good to know

Check your online bill for all surcharges, taxes and gov fees

Balance forward from last bill

Previous balance (through Nov 21)

Payment received - Thank you (Dec 13)

Total balance forward

Account Charges

Unused Carryover data from last month expired December 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

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Monthly charges and credits

The new Verizon Plan Medium 4 GB (Dec 22 - Jan 21)
4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Dec 22 - Jan 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Nov 22 - Dec 21)

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

Monthly charges and credits

Smartphone Line Access (Dec 22 - Jan 21)

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Add-ons

Verizon Cloud 600 GB - (Dec 22 - Jan 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted



This month's data usage

1.13 GB

Other family member cell phone numbers redacted





CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255
GOOGLE PIXEL4A G025J NVZW

Talk activity



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the call log information.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the entire talk activity section.

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services. **Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.**

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are \$185.99.

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were \$150.00 (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: \$8.03 for voice, \$1.65 for messaging, \$140.32 for data, and \$0.00 for other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Additional information

PSC OF WI INCREASED USF PROGRAM ASSESSMENT RATES EFFECTIVE OCTOBER 2022

The Public Service Commission (PSC) of Wisconsin announced new monthly assessment rates for the state Universal Service Fund (USF) programs it oversees.

The assessment rates increased for the USF programs as follows: TEACH Programs: from 0.14059% to 0.14966%; DPI Programs: from 0.23869% to 0.26533%; UW-Systems Services: from 0.01008% to 0.01081%; and Commission USF Programs: from 0.05938% to 0.05993%.

The new assessment rates were used for the USF program billings beginning in October 2022.

Apple Music Price Change

Beginning January 11, 2023, Apple will increase the subscription price for Apple Music from \$9.99/mo to \$10.99/mo. If you subscribe to Apple Music through Verizon, you will see this new price on the first Verizon bill you receive after January 11, 2023.

To manage an Apple Music subscription through Verizon, sign in to verizon.com/myverizon and navigate to Account, then to Apps & add-ons.

If you do not subscribe to Apple Music through Verizon, you will see no change to your monthly bill.



CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

December 21, 2022

[redacted]

4442688457

Total Amount Due by January 13, 2023

Make check payable to Verizon Wireless.
Please return this remittance slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

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Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

	<div style="border: 1px solid red; width: 100%; height: 100%;"></div>	<div style="border-bottom: 1px solid red; height: 100%;"></div>	
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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Dec 22, 2022 - Jan 21, 2023 | Account # [REDACTED]

Invoice # 4455466304

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

[REDACTED]

CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your January bill is [REDACTED]

It's due on Feb 13, 2023. [REDACTED]

Good to know

Check your online bill for all surcharges, taxes and gov fees

Account charges [REDACTED]

Other family member cell phone numbers redacted [REDACTED]

Charles C Adams
920-889-1255 [REDACTED]

Other family member cell phone numbers redacted [REDACTED]

Balance forward from last bill

Previous balance (through Dec 21)

Payment received - Thank you (Jan 13)

Total balance forward [REDACTED]

Account Charges

Unused Carryover data from last month expired January 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Jan 22 - Feb 21)
4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Jan 22 - Feb 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Dec 22 - Jan 21)

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

Monthly charges and credits

Smartphone Line Access (Jan 22 - Feb 21)



CONFIDENTIAL - ATTORNEYS EYES ONLY

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Add-ons

Verizon Cloud 600 GB - (Jan 22 - Feb 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

This month's data usage

1.53 GB


Other family member cell phone numbers redacted





CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity



Charles C Adams

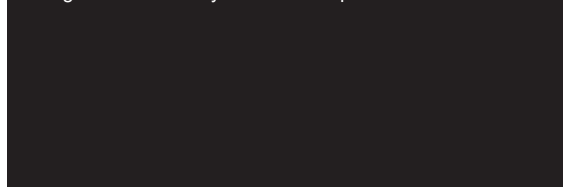
920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity (cont.)

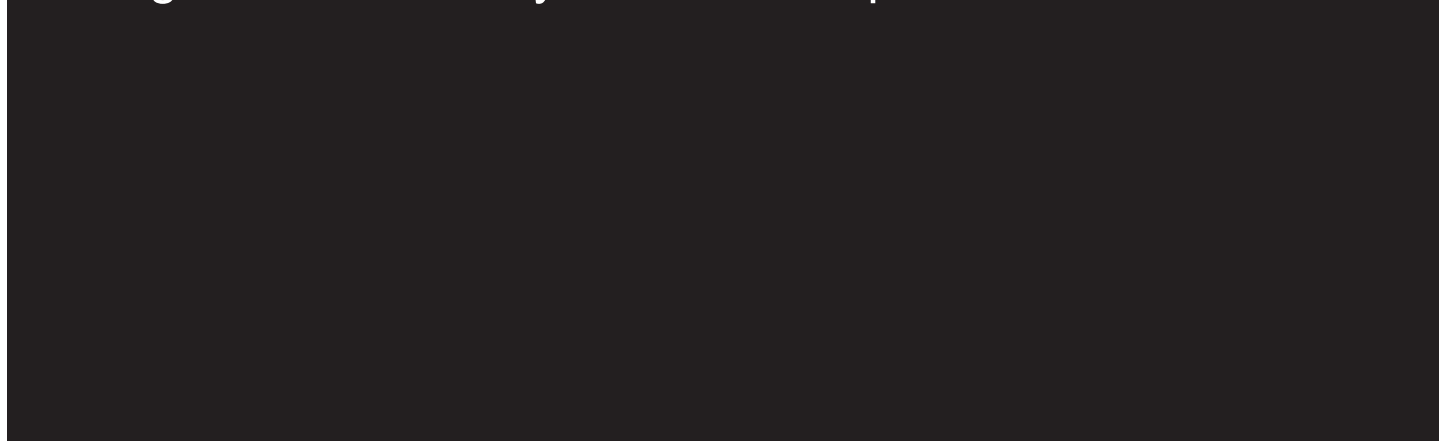


Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the call log data.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the call log data.

Additional information

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows:

[REDACTED]

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Telecommunications Relay

To contact Verizon Wireless using a TTY device, dial 711 to reach a Telecommunications Relay Service (TRS) operator to assist you in completing your call.

Additional information

Consider it fixed

Verizon Home Device Protect is the last warranty you'll need for your connected home products. Get repairs or replacements for covered breakdowns of eligible home entertainment from gaming devices and wearables to home office and smart home products. Visit verizon.com/homedeviceprotect

FUSC Change

The Federal Universal Service Charge (FUSC) is a Verizon Wireless charge that is subject to change each calendar quarter based on contribution rates prescribed by the FCC. On January 1, the FUSC increased to 9.94% of assessable wireless charges, other than separately billed interstate and international telecom charges. The FUSC on separately billed interstate and international telecom charges increased to 32.6%. For more details, please call 1-888-684-1888.



Billing period Dec 22, 2022 - Jan 21, 2023 | Account # [redacted] | Invoice # 4455466304

CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

January 21, 2023
[redacted]
4455466304

Total Amount Due by February 13, 2023

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

IMPORTANT INFORMATION:

Many questions regarding billing can be resolved easily online or in the My Verizon App. Our customer service representatives are also available by phone, chat or in a retail store to assist you with billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to the below address.

Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Jan 22, 2023 - Feb 21, 2023 | Account # [REDACTED] | Invoice # 4468199843

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

|||||

CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill



Your February bill total is the same as last month's. You can see a full breakdown of all this month's charges on go.vzw.com/mybill.

Your February bill is [REDACTED]

It's due on Mar 13, 2023.



Account charges [REDACTED]

Other family member cell phone numbers redacted



Charles C Adams
920-889-1255

Other family member cell phone numbers redacted



Balance forward from last bill

Previous balance (through Jan 21)

Payment received - Thank you (Feb 13)

Total balance forward



Good to know

Check your online bill for all surcharges, taxes and gov fees



Account Charges

Unused Carryover data from last month expired February 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Feb 22 - Mar 21)
4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Feb 22 - Mar 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Jan 22 - Feb 21)

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Data Usage

This month's data usage

Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

"Add Ons" are features, content, and apps that we provide to you directly or through our relationships with certain content, app, and business partners. They are Verizon charges. For questions about these charges, visit <http://m.vzw.com/m/block>.

Monthly charges and credits

Smartphone Line Access (Feb 22 - Mar 21)

Add-ons

Verizon Cloud 600 GB - (Feb 22 - Mar 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted




Other family member cell phone numbers redacted





CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity (cont.)



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

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Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

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Call logs for other family member cell phone numbers redacted



Talk activity

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

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Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows:

[REDACTED]

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Consider it fixed

Verizon Home Device Protect is the last warranty you'll need for your connected home products. Get repairs or replacements for covered breakdowns of eligible home entertainment from gaming devices and wearables to home office and smart home products. Visit verizon.com/homedeviceprotect



CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

February 21, 2023

[redacted]

4468199843

Total Amount Due by March 13, 2023

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

IMPORTANT INFORMATION:

Many questions regarding billing can be resolved easily online or in the My Verizon App. Our customer service representatives are also available by phone, chat or in a retail store to assist you with billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to the below address.

Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)



PO BOX 489
NEWARK, NJ 07101-0489

Billing period Feb 22, 2023 - Mar 21, 2023 | Account # [REDACTED]

Invoice # 4480959641

CONFIDENTIAL - ATTORNEYS EYES ONLY

KEYLINE

[REDACTED]

CHARLES C ADAMS

[REDACTED]

SHEBOYGAN, WI 53081

Pay your bill online, fast and easy

For convenience and peace of mind you can pay your bill online or enroll in Auto Pay and Paper-free Billing. Visit go.vzw.com/paybill

Your March bill is [REDACTED]

It's due on Apr 13, 2023.

[REDACTED]

Account charges [REDACTED]

Other family member cell phone numbers redacted

[REDACTED]

Charles C Adams

920-889-1255

Other family member cell phone numbers redacted

[REDACTED]

Balance forward from last bill

Previous balance (through Feb 21)

Payment received - Thank you (Mar 13)

Total balance forward

[REDACTED]

Good to know

Check your online bill for all surcharges, taxes and gov fees

[REDACTED]

Account Charges

Unused Carryover data from last month expired March 21.

Plan Rate Adjustment

Due to rising operational costs, the rate for your current shared monthly plan is subject to a Plan Rate Adjustment increase. For more information please visit m.vzw.com/planupdate.

You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance, or as allowed by law in the state of your billing address.

Monthly charges and credits

The new Verizon Plan Medium 4 GB (Mar 22 - Apr 21)
4 GB Shared Data, Carryover Data, Unlimited Talk and Text

15% Access Discount

Plan Rate Adjustment Multi (Mar 22 - Apr 21)

Shared data usage

All shared lines

Types of data you used

The new Verizon Plan Medium 4 GB

Carryover from last month (Feb 22 - Mar 21)

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Other family member cell phone numbers redacted

Charles C Adams

920-889-1255

GOOGLE PIXEL4A
G025J NVZW

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Monthly charges and credits

Smartphone Line Access (Mar 22 - Apr 21)

Add-ons

Verizon Cloud 600 GB - (Mar 22 - Apr 21)

Surcharges

Fed Universal Service Charge

Regulatory Charge

Admin & Telco Recovery Charge

WI Universal Service Fund

Taxes and gov fees

WI Police&Fire Protection Fee

WI State Sales Tax-Telec

Sheboygan Cnty Sales Tax-Telec

Data Usage

This month's data usage

Other family member cell phone numbers redacted

Other family member cell phone numbers redacted

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Other family member cell phone numbers redacted

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CONFIDENTIAL - ATTORNEYS EYES ONLY

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Charles C Adams

920.889.1255

GOOGLE PIXEL4A G025J NVZW

Talk activity



Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Talk activity

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted




Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the content of the page.

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted

A large black rectangular redaction box covering the majority of the page content.

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Additional information

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including: (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs; (b) property taxes; and (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows:

[REDACTED]

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Consider it fixed

Verizon Home Device Protect is the last warranty you'll need for your connected home products. Get repairs or replacements for covered breakdowns of eligible home entertainment from gaming devices and wearables to home office and smart home products. Visit verizon.com/homedeviceprotect

Additional information

Important Information Regarding Your Customer Agreement

Verizon has updated parts of your Customer Agreement. In the "My Privacy" section, we specified where customers can view privacy policies specific to their state, if any. In the "How and when can I dispute charges?" section we added where customers can access and complete an online notice of dispute form. In the "HOW DO I RESOLVE DISPUTES WITH VERIZON?" section we clarified certain provisions regarding the rules for and authority of the arbitrator as well as the rules and procedures of the bellwether arbitration proceedings applicable in the event 50 or more customers initiate notices of dispute or file complaint(s) in court which raise similar claims.



Billing period Feb 22, 2023 - Mar 21, 2023 | Account # [redacted] | Invoice # 4480959641

CONFIDENTIAL - ATTORNEYS EYES ONLY

You've got options.

We have all sorts of ways to pay so that you can pick the one that's right for you.

Pay with the My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.

Pay online at vzw.com

Go to go.vzw.com/paybill and sign in to My Verizon to pay your bill online.

Pay in cash

Go to vzw.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment. Go to vzw.com/support/pay-bill-faqs/ to learn more.

Pay by phone: #PMT (#768)

Simply dial #PMT on your phone and follow the instructions to pay.



CHARLES C ADAMS

[redacted]

SHEBOYGAN, WI 53081

Bill date
Account number
Invoice number

March 21, 2023

[redacted]

4480959641

Total Amount Due by April 13, 2023

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$ [] [] [] . [] []

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810



Questions? Visit go.vzw.com/contactus or call 1.800.922.0204.

Change your address at go.vzw.com/changeaddress

IMPORTANT INFORMATION:

Many questions regarding billing can be resolved easily online or in the My Verizon App. Our customer service representatives are also available by phone, chat or in a retail store to assist you with billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to the below address.

Please select a checkbox at the bottom of the page that best describes how we can help you and include it with your written correspondence.

Verizon Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Automatic Payment Enrollment for Account: Account Number redacted **CHARLES C ADAMS**

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

- 1. Check this box.** **2. Sign name in box below, as shown on the bill and date.** **3. Return this slip with your payment. Do not send a voided check.**

		<hr/>	
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Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

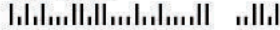
Additional information (for example new address or details on your request)

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

KEYLINE



CHARLES C ADAMS

Street Address redacted

SHEBOYGAN, WI 53081

Questions about your bill?

verizon.com/support

800-922-0204

Ways to pay



My Verizon app

You can download the My Verizon app at go.vzw.com/mva in both the App Store and Google Play.



Online

Go to www.verizon.com/expresspay and sign in to My Verizon to pay your bill.



By phone

Simply dial #PMT (#768) on your phone and follow the instructions to pay.



Cash

Go to www.verizon.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment.

Snapshot of your bill

(details on page 3)

Balance from last bill

This month's charges

Total due on May 13



You'll be charged a late fee when you don't pay your bill on time. The amount is the greater of \$5 or 1.5% of the unpaid balance (whichever is greater), or as allowed by law in the state of your billing address.

We updated the design of your bill.

Learn more about these updates at verizon.com/billupdates



CHARLES C ADAMS

Street Address redacted

SHEBOYGAN, WI 53081

Bill date

April 21, 2023

Account number

Account Number redacted

Invoice number

4493696713

Total Amount Due by May 13, 2023

Make check payable to Verizon Wireless.
Please return this remit slip with payment.



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Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810





CONFIDENTIAL - ATTORNEYS EYES ONLY

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Questions about paying your bill?

Go to go.vzw.com/support/pay-bill-faqs to learn more.

Address change:

Change your address at go.vzw.com/changeaddress.

Questions about your bill?

verizon.com/support

800-922-0204

Important Information:

Many billing questions can be resolved easily online or with the My Verizon App. Customer service can also assist you by phone, chat or in a retail store for billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to this below address:

Verizon
Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Select a checkbox that describes how we can help you along with any additional information and include it with your written correspondence.

Automatic Payment Enrollment for Account: Account Number redacted CHARLES C ADAMS

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

1. Check this box.

2. Sign name in box below, as shown on the bill and date.

3. Return this slip with your payment. Do not send a voided check.



Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment
Verification

Address
Change

Name
Change

Billing
Dispute

Service
Change

Other

☐☐☐☐☐☐

Additional information (for example new address or details on your request)

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Your April bill is

Due May 13

Questions about your bill?

verizon.com/support

800-922-0204

Since your last bill

Review bill details



My Verizon app

You can check your bill easily with the My Verizon app. Download the app at govzw.com/mva in both the App Store and Google Play.



Online

Go to govzw.com/mybill and sign in to My Verizon to review your bill.

Bill summary

One time charges

Plans

Apps & add ons

Surcharges

Taxes & gov fees

Total:

Surcharges, taxes and gov fees

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Charges by line summary

Other family member cell phone numbers redacted



Charles C Adams

Smartphone

920-889-1255

Other family member cell phone numbers redacted



Shared account charges

Total:



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Charges by line details

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted





Account: Account Number redacted
Invoice: 4493696713
Billing period: Mar 22 - Apr 21, 2023

Charges by line details (continued)
Other family member cell phone numbers redacted

Charles C Adams

Smartphone
920-889-1255

One-time charges & credits

Long Distance - VERIZON WIRELESS

Plan(s)

Smartphone line access
Apr 22 - May 21

Apps & add-ons

Verizon Cloud 600 GB
Apr 22 - May 21

Surcharges

Fed Universal Service Charge
Regulatory Charge
Admin & Telco Recovery Charge
WI Universal Service Fund

Taxes & gov fees

WI Police&Fire Protection Fee
WI State Sales Tax-Telec
Sheboygan Cnty Sales Tax-Telec

Taxes for add-on purchases and "Purchases from other vendors" are billed in "Taxes and gov fees." For a breakout of tax details visit go.vzw.com/mybill.

Other family member cell phone numbers redacted

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Charges by line details (continued)

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted



Shared account charges

One-time charges & credits



Plan(s)

The new Verizon Plan Medium 4 GB
Apr 22 - May 21

15% Access Discount
Apr 22 - May 21

PLAN RATE ADJUSTMENT MULTI
Apr 22 - May 21



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Plan rate adjustment

Due to rising operational costs, the rate for your current shared monthly plan will increase. For more information, visit m.vzw.com/planupdate.

Your unused carryover data from last month has expired April 21.

Plan rate adjustment

Due to rising operational costs, the rate for your current shared monthly plan will increase. For more information, visit m.vzw.com/planupdate.

Talk activity

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted**Invoice:** 4493696713**Billing period:** Mar 22 - Apr 21, 2023**Talk activity (cont.)**

Call logs for other family member cell phone numbers redacted

**Talk activity**

Call logs for other family member cell phone numbers redacted

**Talk activity****Charles C Adams**

920-889-1255

GOOGLE PIXEL4A G025J NVZW

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Charles C Adams

920-889-1255

GOOGLE PIXEL4A G025J NVZW



Talk activity

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Additional information

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including:

- (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs;
- (b) property taxes; and
- (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: [REDACTED]
[REDACTED]
other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Important Notice: New 274 Area Code Coming

We want to make sure that you are aware of, and prepared for, the new 274 area code overlay coming to the 920 area. An overlay is the addition of another area code to the same geographic area as an existing area code(s). To ensure a continuing supply of telephone numbers, the Public Service Commission of Wisconsin has approved the addition of the 274 area code to the geographic region served by the 920 area code region. The 920 area code serves northeastern Wisconsin, including the communities of Appleton, Beaver Dam, Berlin, Fond du Lac, Fort Atkinson, Green Bay, Manitowoc, Neenah, Oshkosh, Ripon, Sheboygan, Sturgeon Bay and Watertown.

The Important Date To Know

May 5, 2023: New lines of service may be issued numbers with a 274 area code. If you receive a 274 area code, you must enter the area code + telephone number on all calls or the call will not be completed.

Account: Account Number redacted

Invoice: 4493696713

Billing period: Mar 22 - Apr 21, 2023

Additional information continued

Here's What Will Not Change

- Your telephone number, which includes your area code, will remain the same.
- The way you make calls today will remain the same. For customers with a 920 number, you'll simply continue to enter the area code and telephone number for all calls.
- The price of a call, your local calling area, and other rates and services will not change due to the overlay.
- 911, 988, 411, 211 and any other 3-digit services in your area will still be dialed with just 3 digits.

How To Prepare

- Continue to identify your phone number as a 10-digit number (area code + 7-digit telephone number), and include the area code when giving your number to friends, family, business associates and customers.
- Check to ensure that all services, automatic dialing equipment, or other types of equipment recognize the new 274 area code. Some examples include: life safety systems and medical monitoring devices, fax machines, Internet dial-up numbers, fire alarm and security systems, security gates, call-forwarding settings and speed dialers.
- Double-check that personal or business checks, websites, contact information, stationery, advertising materials, ID tags and other important information containing your phone number include the area code.

We're Here To Help

If you have any further questions, please click [verizon.com/areacodes](https://www.verizon.com/areacodes) or call 1-800-922-0204. We appreciate your business and look forward to continuing to provide you with the support and service you deserve.

Verizon Advertising and Insights Programs

Lines on your account may be participating in Verizon advertising and insights programs:

Our Custom Experience programs are designed to give you more relevant Verizon offers and experiences. The programs help us personalize the communications we send you and the information you see on our website and app.

Our Business and Marketing Insights program helps us and others better understand customer behaviors in aggregate.

You can change your choices about participating at any time and learn more about the programs using privacy settings in the My Verizon app or on the My Verizon website.

FUSC Change

The Federal Universal Service Charge (FUSC) is a Verizon Wireless charge that is subject to change each calendar quarter based on contribution rates prescribed by the FCC. On April 1, the FUSC decreased to 8.73% of assessable wireless charges, other than separately billed interstate and international telecom charges. The FUSC on separately billed interstate and international telecom charges decreased to 29%. For more details, please call 1-888-684-1888.

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Questions about your bill?

verizon.com/support

800-922-0204

KEYLINE

|||||

CHARLES C ADAMS

Street Address redacted

SHEBOYGAN, WI 53081

Ways to pay



My Verizon app

You can check your bill easily with the My Verizon app available in App Store or Google Play.



Online

Go to go.vzw.com/bill and sign in to review your bill.



By phone

Simply dial #PMT (#768) on your phone and follow the instructions to pay.



Cash

Go to www.verizon.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment.

Snapshot of your bill

(details on page 3)

Balance from last bill

This month's charges

Total due on Jun 13



You'll be charged up to 1.5% per month (18% per year) on the unpaid balance, or a flat \$5 per month, whichever is greater, if allowed by law in the state of your billing address.

We updated the design of your bill.

Learn more about these updates at verizon.com/billupdates

verizon

CHARLES C ADAMS

Street Address redacted

SHEBOYGAN, WI 53081

Bill date

May 21, 2023

Account number

Account Number redacted

Invoice number

4506389019

Total Amount Due by June 13, 2023

Make check payable to Verizon Wireless.
Please return this remit slip with payment.

\$.

Please see back for instructions on writing to us.

PO BOX 16810
NEWARK, NJ 07101-6810

|||||



CONFIDENTIAL - ATTORNEYS EYES ONLY

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Questions about paying your bill?

Go to go.vzw.com/support/pay-bill-faqs to learn more.

Address change:

Change your address at go.vzw.com/changeaddress.

Questions about your bill?

verizon.com/support

800-922-0204

Important Information:

Many billing questions can be resolved easily online or with the My Verizon App. Customer service can also assist you by phone, chat or in a retail store for billing questions or disputes.

All written communication related to billing disputes and checks tendered as payment in full to a billing dispute must be sent to this below address:

Verizon
Attn: Correspondence Team
PO Box 15069
Albany, NY 12212

Select a checkbox that describes how we can help you along with any additional information and include it with your written correspondence.

Automatic Payment Enrollment for Account: Account Number redacted CHARLES C ADAMS

By signing below, you authorize Verizon to electronically debit your bank account each month for the total balance due on your account. The check you send will be used to setup Automatic Payment. You will be notified each month of the date and amount of the debit 10 days in advance of the payment. You agree to receive all Auto Pay related communications electronically. I understand and accept these terms. This agreement does not alter the terms of your existing Customer Agreement. I agree that Verizon is not liable for erroneous bill statements or incorrect debits to my account. To withdraw your authorization you must call Verizon. Check with your bank for any charges.

1. Check this box. 2. Sign name in box below, as shown on the bill and date. 3. Return this slip with your payment. Do not send a voided check.

Please select a checkbox that best describes how we can help you and include details in the box below with any written correspondence.

Payment Verification	Address Change	Name Change	Billing Dispute	Service Change	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional information (for example new address or details on your request)

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Your May bill is

Due Jun 13

Questions about your bill?

verizon.com/support

800-922-0204

Since your last bill

Review bill details



My Verizon app

You can check your bill easily with the My Verizon app available in Apple App store or Google Play.



Online

Go to go.vzw.com/bill and sign in to review your bill.

Bill summary

One time charges

Plans

Apps & add ons

Surcharges

Taxes & gov fees

Total:

Surcharges, taxes and gov fees

Review your bill

An itemized bill with a line-by-line breakdown of all charges and credits is available on the My Verizon app and online.

Scan the QR code with your camera app or go to go.vzw.com/bill.





Account: Account Number redacted
Invoice: 4506389019
Billing period: Apr 22 - May 21, 2023

Charges by line summary

Other family member cell phone numbers redacted

[Redacted]

Charles C Adams
Smartphone
920-889-1255

[Redacted]

Other family member cell phone numbers redacted

[Redacted]

Shared account charges

[Redacted]

Total:

[Redacted]

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Charges by line details

Other family member cell phone numbers redacted



Other family member cell phone numbers redacted





Account: Account Number redacted
Invoice: 4506389019
Billing period: Apr 22 - May 21, 2023

Charges by line details (continued)
Other family member cell phone numbers redacted

<div>Charles C Adams</div> <div>Smartphone</div> <div>920-889-1255</div> <div>One-time charges & credits</div>	
Plan	
Smartphone line access	
May 22 - Jun 21	
Apps & add-ons	
Verizon Cloud 600 GB	
May 22 - Jun 21	
Surcharges	
Fed Universal Service Charge	
Regulatory Charge	
Admin & Telco Recovery Charge	
WI Universal Service Fund	
Taxes & gov fees	
WI Police&Fire Protection Fee	
WI State Sales Tax-Telec	
Sheboygan Cnty Sales Tax-Telec	

Taxes for add-on purchases and "Purchases from other vendors" are billed in "Taxes and gov fees." For a breakout of tax details visit go.vzw.com/mybill.

Other family member cell phone numbers redacted

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Charges by line details (continued)

Other family member cell phone numbers redacted



Shared account charges

Plan

The new Verizon Plan Medium 4 GB
May 22 - Jun 21



Plan rate adjustment

Due to rising operational costs, the rate for your current shared monthly plan will increase. For more information, visit m.vzw.com/planupdate.

Your unused carryover data from last month has expired May 21.



CONFIDENTIAL - ATTORNEYS EYES ONLY

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

15% Access Discount

May 22 - Jun 21

PLAN RATE ADJUSTMENT MULTI

May 22 - Jun 21



Talk activity

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Talk activity

Charles C Adams

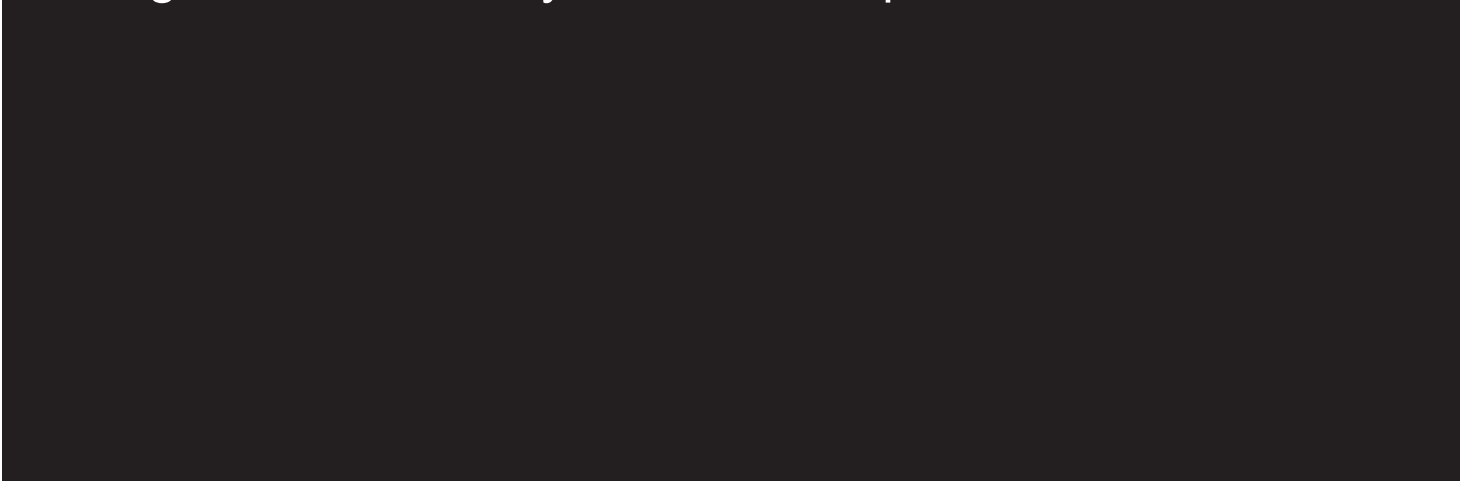
920-889-1255

GOOGLE PIXEL4A G025J NVZW



Talk activity

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted**Invoice:** 4506389019**Billing period:** Apr 22 - May 21, 2023**Talk activity (cont.)**

Call logs for other family member cell phone numbers redacted

**Talk activity**

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

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Billing period: Apr 22 - May 21, 2023

Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

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Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Talk activity (cont.)

Call logs for other family member cell phone numbers redacted



Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Additional information

Customer Proprietary Network Information (CPNI)

CPNI is information made available to us solely by virtue of our relationship with you that relates to the type, quantity, destination, technical configuration, location, and amount of use of the telecommunications and interconnected VoIP services you purchase from us, as well as related billing information. The protection of your information is important to us, and you have a right, and we have a duty, under federal law, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services, such as television, telematics, high-speed Internet, video, and local and long distance services. Visit Verizon.com for more information on our services and companies.

If you don't want your CPNI used for the marketing purposes described above, please notify us by phone any time at 800.333.9956 or online at vzw.com/myprivacy.

Unless you notify us in one of these ways, we may use your CPNI as described above beginning 30 days after the first time we notify you of this CPNI policy. Your choice will remain valid until you notify us that you wish to change your selection. Your decision about use of your CPNI will not affect the provision of any services you currently have with us.

Note: This CPNI notice does not apply to residents of the state of Arizona.

Explanation of Surcharges

Verizon wireless surcharges include (i) a Regulatory Charge (which helps defray various government charges we pay including government number administration and license fees); (ii) a Federal Universal Service Charge (and, if applicable, a State Universal Service Charge) to recover charges imposed on us by the government to support universal service; and (iii) an Administrative and Telco Recovery Charge, which helps defray and recover certain direct and indirect costs we or our agents incur, including:

- (a) costs of complying with regulatory and industry obligations and programs, such as E911, wireless local number portability and wireless tower mandate costs;
- (b) property taxes; and
- (c) costs associated with our network, including facilities (e.g. leases), operations, maintenance and protection, and costs paid to other companies for network services.

Please note that these are Verizon wireless charges, not taxes or government imposed fees. These charges, and what's included, are subject to change from time to time.

Service Plan Features & Services

If your service plan has optional features or services that are included as part of your monthly subscription, electing to activate these subscriptions may affect your surcharges, taxes and governmental fees, even though your plan monthly service price does not change. Examples of these features are Apple Music or the Disney bundle.

Taxes and Other Governmental Charges

We are required by law to collect these charges, which are based on your service address. You can update your service address on go.vzw.com/changeaddress.

More On Wireless Taxes And Surcharges

Your total charges for this month's bill cycle are [REDACTED]

This includes charges for one or more bundled Verizon service plans that include voice, messaging, data, or other services for which you pay a monthly plan charge.

This bill cycle, your fixed monthly plan charges were [REDACTED] (before applying any discounts or credits, and excluding other charges such as overage, late payment, taxes, Verizon surcharges, and equipment).

To accurately bill taxes and Verizon surcharges, we regularly look at past network usage by you and other customers with similar plans to allocate this fixed monthly plan charge among the services included in the bundle.

In this bill cycle, we have allocated this amount as follows: [REDACTED] for other services.

For more information, please go to vzw.com/taxesandsurcharges.

Bankruptcy Information

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy charges. You should not pay pre-bankruptcy amounts; they are for your information only. In the event Verizon receives notice of a bankruptcy filing, pre-bankruptcy charges will be adjusted in future invoices. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

Important Notice: New 274 Area Code Coming

We want to make sure that you are aware of, and prepared for, the new 274 area code overlay coming to the 920 area. An overlay is the addition of another area code to the same geographic area as an existing area code(s). To ensure a continuing supply of telephone numbers, the Public Service Commission of Wisconsin has approved the addition of the 274 area code to the geographic region served by the 920 area code region. The 920 area code serves northeastern Wisconsin, including the communities of Appleton, Beaver Dam, Berlin, Fond du Lac, Fort Atkinson, Green Bay, Manitowoc, Neenah, Oshkosh, Ripon, Sheboygan, Sturgeon Bay and Watertown.

The Important Date To Know

May 5, 2023: New lines of service may be issued numbers with a 274 area code. If you receive a 274 area code, you must enter the area code + telephone number on all calls or the call will not be completed.

Account: Account Number redacted

Invoice: 4506389019

Billing period: Apr 22 - May 21, 2023

Additional information continued

Here's What Will Not Change

- Your telephone number, which includes your area code, will remain the same.
- The way you make calls today will remain the same. For customers with a 920 number, you'll simply continue to enter the area code and telephone number for all calls.
- The price of a call, your local calling area, and other rates and services will not change due to the overlay.
- 911, 988, 411, 211 and any other 3-digit services in your area will still be dialed with just 3 digits.

How To Prepare

- Continue to identify your phone number as a 10-digit number (area code + 7-digit telephone number), and include the area code when giving your number to friends, family, business associates and customers.
- Check to ensure that all services, automatic dialing equipment, or other types of equipment recognize the new 274 area code. Some examples include: life safety systems and medical monitoring devices, fax machines, Internet dial-up numbers, fire alarm and security systems, security gates, call-forwarding settings and speed dialers.
- Double-check that personal or business checks, websites, contact information, stationery, advertising materials, ID tags and other important information containing your phone number include the area code.

We're Here To Help

If you have any further questions, please click [verizon.com/areacodes](https://www.verizon.com/areacodes) or call 1-800-922-0204. We appreciate your business and look forward to continuing to provide you with the support and service you deserve.

411 Search Price Change

Beginning July 1st, 2023, Verizon will increase the price for 411 Search from \$1.99 per call to \$2.99 per call. If you make a 411 Search call from your wireless line, you will see this new price on the Verizon bill you receive after July 1st, 2023.

If you do not make a 411 Search call, this change will not have any impact on your wireless bill. For more information about 411 Search, visit [verizon.com/support/411-connect-faqs](https://www.verizon.com/support/411-connect-faqs). This price increase does not apply to wireless lines that receive Free 411 services under Verizon's Courtesy 411 Program for customers with disabilities.

EXHIBIT F

From: [Kerrie Murphy](#)
To: [Jen DeMaster](#)
Cc: [Warren Buliox](#); [Katie Dienberg](#); [Anthony Jackson](#); [Paralegal](#)
Subject: Pelishek litigation - Follow up to meet and confer conference call on Sept. 23, 2024
Date: Wednesday, September 25, 2024 5:13:35 PM
Attachments: [image001.png](#)
[Defendants response to DeMaster 9.17.24 GFL Ltr - corrected to remove reference to settlement communication and resent on 9.23.24.pdf](#)
[MG000927-Pel - MG000929-Pel.pdf](#)
[CA000001-Pel - CA000003-Pel Confidential Attorneys Eyes Only.pdf](#)
[CA000023-Pel - CA000237-Pel Confidential Attorneys Eyes Only.pdf](#)
[RS000476\(Wolf\) - RS000519\(Wolf\) CONFIDENTIAL ATTORNEYS EYES ONLY.pdf](#)
[ERA000001-Pel - ERA000181-Pel CONFIDENTIAL ATTORNEYS EYES ONLY.pdf](#)

Jen,

As you requested, here is another copy of the letter we sent to you on September 20, 2024, which as removed the incorrect designation that it was a confidential settlement communication.

I misspoke during our meet and confer call on Sept. 23 in relation to the screenshot of the 3/7/2023 email that you provided to us. I was referring to the email that we produced with our September 20th letter which was Bates stamped MG000921-MG000926 when I made that statement during our call. I apologize for misspeaking. The 3/7/2023 email was not one of the emails that IT Director Greenwood pulled in relation to the ESI searches that he conducted regarding the Requests for Production served on Mayor Sorenson. However, since we did agree to produce the email that was depicted in the screenshot provided by Plaintiff, during our meet and confer call today, I had IT Director Greenwood search for the email and send it to me. It is attached to this email as MG000927-MG000929.

As we indicated during our call on Sept. 23, Plaintiff's email address was not included in the search that was done in relation to Mayor Sorenson's Request No. 3 and Ms. Rendall-Araujo – Request No. 8. All other known email addresses for any individual listed in both parties initial disclosures were included in the ESI searches run by IT Director Greenwood. We assumed that you would specifically list Plaintiff if you wanted his email account included in a search. However, given your assertion that Plaintiff is listed in the Initial Disclosures" and should have been included these searches, we have asked IT Director Greenwood to run a search for these 2 Requests. If there are any emails "relating to the allegations in the above-captioned case, the above-captioned case, Chad, Pelishek, or any legal counsel for Chad Pelishek" pulled by these searches, these 2 responses will be supplemented.

City Attorney Adams. We have attached unredacted copies of CA000001-CA000003. **Please substitute this production for the prior redacted copies.**

We disagree that Request No. 1 issued to City Attorney Adams asked for billing statements for his cell phone number. His cell phone number was not included as one of the phone numbers specifically listed in the Request and it is a phone number that Plaintiff's counsel knew was

associated with this defendant since redacted cell phone records were produced in the Wolf litigation. However, to resolve this dispute, City Attorney Adams has agreed to produce copies of his cell phone records from August 22, 2022 – May 1, 2023, Bates stamped CA000023-Pel – CA000237-Pel. There are 5 cell phone numbers associated with Account, (920) 889-1255 is the cell phone number assigned to City Attorney Adams. The other lines are used by his family members and information related to those lines has been redacted.

All phone records produced by City Attorney Adams are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

Mayor Sorenson. We have attached unredacted copies of RS000476-RS000519(Wolf) which were Mayor Sorenson’s redacted cell phone records produced in the Wolf litigation as you requested during our call.

Mayor Sorenson cannot access his call/text log records any further back than what has been provided via his online account. He sent a request to AT & T for billing statements from August 22, 2022 – May 1, 2023 as well as his call and text logs for August 22, 2022 – October 31, 2022 and February 3, 2023 – May 1, 2023. We will produce what we are provided once we have received them from A T & T.

All phone records produced by Mayor Sorenson are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

Emily Rendall-Araujo. We have attached unredacted copies of ERA000001-Pel – ERA000181-Pel, which covers the time period identified in Request No. 1. **Please substitute this production for the prior redacted copies.** There are 4 lines associated with this Account, (920) 207-5899 is the cell phone number assigned to Emily. The other lines are used by her family members and information related to those lines has been redacted.

All phone records produced by Emily are marked “Confidential – Attorneys Eyes Only” as agreed upon by the parties. We expect you to adhere to the confidentiality protections provided these records under the Protective Order.

City Phone records. IT Director Greenwood has advised that he has requested copies of the phone records responsive to subpoena Topic 11. We will supplement the City’s response to the subpoena once we receive these records.

We anticipate that the information provided in our letter dated September 20, 2024, our meet and confer call on September 23, 2024, as well as this additional production has addressed the discovery issues raised by you in your September 17 letter. Please confirm that you will not be sending any subpoenas for phone records based on our compromises and production of unredacted phone records.

Kerrie M. Murphy
Managing Partner
D: 515.657.5684



West Des Moines Office:

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4350 Westown Parkway, Suite 120
West Des Moines, IA 50266
T: 515.453.8509 | **F:** 515.267.1408

Milwaukee Office

735 North Water Street | Suite 610 | Milwaukee | WI 53202
T: 414.436.0353 | **F:** 414.436.0354

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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